

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

In Re:

Vera Levert Wylie

Debtor(s)

3190 J.B. Denton Road  
Lancaster, SC 29720

Last four digits of Social-Security or Individual  
Tax-Payer-Identification (ITIN) No(s).,  
xxx-xx-2241

Case Number 20-02700  
Chapter 13

NOTICE OF MOTION/APPLICATION AND  
OPPORTUNITY FOR HEARING

Debtor has filed papers with the court to Sell Property.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Motion, or you want the court to consider your views on the Motion, then within 21 days of service of this notice, you or your attorney must:

File with the court a written response, return, or objection at:  
United States Bankruptcy Court  
1100 Laurel Street  
Columbia, SC 29201

Responses, returns, or objections filed by an attorney must be electronically filed in [ecf.scb.uscourts.gov](http://ecf.scb.uscourts.gov).

If you mail your response, return, or objection to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also send a copy to: F. Lee O'Steen, P.O. Box 36534, Rock Hill, SC 29732

Attend the hearing scheduled to be heard on **March 10, 2022**, at **10:30 AM**, at **Donald Stuart Russell Federal Courthouse**, 201 Magnolia Street, Spartanburg, SC 29306-2355 .

If no response, return, and or objection is timely filed and served, no hearing will be held on this Motion, except at the direction of the judge.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: January 17, 2022

/s/ F. Lee O'Steen  
F. Lee O'Steen, Fed ID 8032  
P.O. Box 36534, Rock Hill, SC 29732  
Phone (803) 327-5300; Fax (803) 327-5250  
[lee@osteenlawfirm.com](mailto:lee@osteenlawfirm.com)

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In Re:

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**MOTION TO SELL PROPERTY AND MEMORANDUM**

The undersigned, as attorney for the debtor moves to sell property. The debtor moves to sell debtor's interest in lot and improvements located at 1731 Flat Creek Road, Lancaster, SC 29720 (TM#0081D-0F-013.00), pursuant to 11 U.S.C. 363 and Bankruptcy Rule 6004. The debtor believes that the buyer is a good faith purchaser. The debtor further believes that this sell is in the best interest of the estate.

TYPE OF SALE: Private

PROPERTY TO BE SOLD: Debtor partial interest in 1731 Flat Creek Road, Lancaster, SC 29720 (TM#0081D-0F-013.00) . Per a Deed of Distribution recorded August 29, 2017, debtor holds a 1/3 interest in this property.

PRICE: \$150,000

APPRAISAL VALUE: No current appraisal is available

BUYER: Brian Willard

PLACE AND TIME OF SALE: At the office of the buyer's attorney within a reasonable time following the entry of an order approving this motion.

**LIENS/MORTGAGES/SECURITY INTEREST ENCUMBERING PROPERTY:**

All liens and judgement on the Property shall be paid at the time of closing. The known liens and or judgments are:

There is a mortgage which will be satisfied. The amount is estimated to be \$70,000 owed. And a judgment to National Finance is showing in Debtor's schedules..

No certification is being provided that these are the only encumbrance against the property. No title search has been performed to provide any assurance to any party about the existence of any liens or judgments on the Property or UCCs on any personal property or fixtures to be transferred with the Property. Purchaser, interested party and closing attorney should check title records and provide a survey as necessary to satisfy their requirements.

DEBTOR'S EXEMPTION: \$5,050 Claimed on an amended Schedule C.

PROCEEDS ESTIMATED TO BE PAID TO ESTATE: \$15,000 (to Chapter 13 Trustee)

Applicant is informed and believes that is would be in the best interest of the estate to sell said property by private sale. Applicant also believes that the funds to be recovered for the estate from the sale of said property justify its sale and the filing of this application.

The Court may consider additional offers at any hearing held on this notice and application for sale. The Court may order at any hearing that the property be sold to another party on equivalent or more favorable term.

The Trustee or debtor, as applicable, may seek sanctions or other similar relief against any party filing a spurious objection to this notice and application.

WHEREFORE, applicant requests the Court issue an order authorizing sale of said property and such other and further relief as may be proper.

Rock Hill, SC

January 17, 2022

/s/ F. Lee O'Steen

F. Lee O'Steen, DC # 08032

O'Steen Law Firm, LLC

P.O. Box 36534, Rock Hill, SC 29732

(803) 327-5300 phone; (803) 327-5250 Fax

Lee@OsteenLawFirm.com

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DISTRICT OF SOUTH CAROLINA

In Re:

Vera Levert Wylie

Case Number 20-02700  
Chapter 13

Debtor(s)

3190 J.B. Denton Road  
Lancaster, SC 29720

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Tax-Payer-Identification (ITIN) No(s).,  
xxx-xx-2241

CERTIFICATE OF SERVICE

I hereby certify that a copy of the within NOTICE OF MOTION/APPLICATION AND OPPORTUNITY FOR HEARING; MOTION TO SELL PROPERTY FREE AND MEMORANDUM was duly served upon the parties below named, by depositing said papers in the United States Mail at Rock Hill, South Carolina, on this date, with first class postage duly affixed and a return address clearly indicated on said envelope to the address below and on the attached matrix as indicated.

Chapter 13 Trustee and the UST by Electronic Notice Only

Rock Hill, SC

January 17, 2022

/s/ F. Lee O'Steen

F. Lee O'Steen, DC # 08032

O'Steen Law Firm, LLC

P.O. Box 36534, Rock Hill, SC 29732

(803) 327-5300 phone; (803) 327-5250 Fax

Lee@OsteenLawFirm.com

Label Matrix for local noticing

Aaron Sales &amp; Lease Ow

Ameri Cash

0420-3

1015 Cobb Place Blvd Nw

2186 Cherry Road, Suite 107

Case 20-02700-hb

Kennesaw GA 30144-3672

Rock Hill SC 29732-3282

District of South Carolina

Columbia

Mon Jan 17 11:54:43 EST 2022

Arronrnts

Arrow Pointe Fcu

Ars

1015 Cobb Place Blvd Nw

5298 Cureton Ferry Rd

1801 Nw 66th Ave

Kennesaw GA 30144-3672

Catawba SC 29704-8799

Fort Lauderdale FL 33313-4571

(p)ATLAS ACQUISITIONS LCC

Bank of America Home Loans

Bank of America, N.A.

492C CEDAR LANE SUITE 442

PO Box 650070

1600 South Douglass Road

TEANECK NJ 07666-1713

Dallas TX 75265-0070

Anaheim, CA 92806-5948

(p)JPMORGAN CHASE BANK N A

Gentry Collins

Commonwealth Financial

BANKRUPTCY MAIL INTAKE TEAM

Brock &amp; Scott, PLLC

245 Main St

700 KANSAS LANE FLOOR 01

8757 Red Oak Boulevard

Dickson City PA 18519-1641

MONROE LA 71203-4774

Suite 150

Charlotte, NC 28217-3977

Credit Central

Credit Central

Credit Recovery

1512 E Main Street

700 E North St Ste 15

Pob 1228

Rock Hill SC 29730-6146

Greenville SC 29601-3013

Mauldin SC 29662-1228

ERC/Enhanced Recovery Corp

Equifax Information Services LLC

Experian

8014 Bayberry Rd

PO Box 740256

PO Box 2002

Jacksonville FL 32256-7412

Atlanta GA 30374-0256

Allen TX 75013-2002

(p)US DEPARTMENT OF HOUSING AND URBAN DEVELOP

Fed Loan Servicing

Fed Loan Servicing

ATTN ROBERT ZAYAC

Po Box 60610

Po Box 69184

40 MARIETTA ST SUITE 300

Harrisburg PA 17106-0610

Harrisburg PA 17106-9184

ATLANTA GA 30303-2812

Financial Data Systems

George Conits

(p)GLOBAL PAYMENTS CHECK SERVICES LLC

1638 Military Cutoff Rd

U.S. Attorney General Office

ATTN F&amp;B SUPPORT

Wilmington NC 28403-5751

55 Beattie Place, Suite 700

6215 W HOWARD STREET

Greenville SC 29601-2168

NILES IL 60714-3403

(p)INTERNAL REVENUE SERVICE

LVNV Funding, LLC

Lancaster County Clerk of Court

CENTRALIZED INSOLVENCY OPERATIONS

Resurgent Capital Services

P.O. Box 1809

PO BOX 7346

PO Box 10587

Lancaster SC 29721-1809

PHILADELPHIA PA 19101-7346

Greenville, SC 29603-0587

Annemarie Belanger Mathews

Travis E. Menk

Midland Funding

Chapter 13 Office

Brock &amp; Scott, PLLC

2365 Northside Dr Ste 30

3700 Forest Drive

8757 Red Oak Blvd.

San Diego CA 92108-2709

Suite 302

Suite 150

Columbia, SC 29204-4010

Charlotte, NC 28217-3977

Midland Funding  
2635 Northside Dr Ste 300  
San Diego CA 92108

(p)NATIONAL CREDIT SYSTEMS  
ATTN MELANIE MAYFIELD  
3750 NATURALLY FRESH BLVD  
ATLANTA GA 30349-2964

National Finance  
104 Woodland Drive  
Lancaster SC 29720-4707

Navy Federal Credit Union  
PO Box 3000  
Merrifield, VA 22119-3000

North Carolina Department of Revenue  
Angela C. Fountain Bankruptcy Manager  
Collections Examination Division  
P.O. Box 1168  
Raleigh NC 27602-1168

F. Lee O'Steen  
O'Steen Law Firm, LLC  
PO Box 36534  
Rock Hill, SC 29732-0509

Ocwen  
PO Box 785058  
Orlando FL 32878-5058

PHH Mortgage Corporation  
1661 Worthington Road, Suite 100  
West Palm Beach, FL 33409-6493

James M. Page  
Bell Carrington Price & Gregg, LLC  
339 Heyward Street  
2nd Floor  
29201  
Columbia, SC 29201-4390

Porter's Used Cars  
1401 Hwy 9 Bypass West  
Lancaster SC 29720

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Sensbl Auto  
275 Middlesex Turn  
Old Saybrook CT 06475-4209

Sensible Auto Finance  
26 MILL PLAIN RD STE 2D  
DANBURY, CT 06811-5186

South Carolina Attorney General  
Honorable Alan Wilson  
P.O. Box 11549  
Columbia SC 29211-1549

(p)SOUTH CAROLINA DEPARTMENT OF REVENUE  
OFFICE OF THE GENERAL COUNSEL - BANKRUPTCY SE  
300A OUTLET POINTE BLVD  
COLUMBIA SC 29210-5666

Trans Union Corporation  
PO Box 2000  
Crum Lynne PA 19022

US Trustee's Office  
Strom Thurmond Federal Building  
1835 Assembly Street  
Suite 953  
Columbia, SC 29201-2448

U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington DC 20530-0001

US Attorney For SC  
1441 Main Street  
Columbia SC 29201-2862

US Dept of Veterans Affairs  
P.O. Box 530269  
Atlanta GA 30353-0269

USDA  
P.O. Box 66827  
Saint Louis MO 63166-6827

USDA Rural Development  
Centralized Servicing Center  
PO Box 66827  
Saint Louis MO 63166-6827

Vera Levert Wylie  
3190 J.B. Denton Road  
Lancaster, SC 29720-7160

York County Clerk of Court  
PO Box 649  
York SC 29745-0649

York County Master in Equity  
PO Box 627  
York SC 29745-0627